

UNITED STATES DEPARTMENT OF AGRICULTURE
BEFORE THE SECRETARY OF AGRICULTURE

In re:) HPA Docket No. 15-0001 OALJ/HCO
)
) William Brock Tillman,)
)
) Respondent.) Complaint



There is reason to believe that the respondent named herein has violated the Horse Protection Act, as amended (15 U.S.C. §1821 et seq.), herein referred to as the Act. Therefore, the Administrator of the Animal and Plant Health Inspection Service ("APHIS") issues this complaint alleging the following:

I

- (a) Respondent William Brock Tillman is an individual. The mailing address will not be provided in the complaint to protect the privacy of Respondent Tillman, but will be provided to the Hearing Clerk's Office, United States Department of Agriculture, for the purpose of service of this complaint and future documents.
- (b) Respondent entered for the purpose of showing or exhibiting the horse known as "He Has Status" as entry number 563, class number 8 at the 2013, Bedford Cancer Foundation, Inc., Walking For Cancer Horse Show, held April 13, 2013, in Shelbyville, Tennessee.
- (c) Respondent entered for the purpose of showing or exhibiting the horse known as "Calipari's Cousins" as entry number 176, class number 20 at the 2014 Mississippi Charity Horse Show, held March 27-29, 2014, in Jackson, Mississippi.

II

On or about April 13, 2013, the respondent, in violation of section 5(2)(B) of the Act (15 U.S.C. § 1824(2)(B)), entered for the purpose of showing or exhibiting the horse known as "He Has Status" as entry number 563, class number 8, at the Bedford Cancer Foundation, Inc., Walking For Cancer Horse Show, while the horse was sore.

III

On or about March 27, 2014, the respondent, in violation of section 5(2)(B) of the Act (15 U.S.C. § 1824(2)(B)), entered for the purpose of showing or exhibiting the horse known as "Calipari's Cousins" as entry number 176, class number 20, at the 2014 Mississippi Charity Horse Show, held March 27-29, 2014, in Jackson, Mississippi, while the horse was sore.

WHEREFORE, it is hereby ordered for the purpose of determining whether the respondent has in fact violated the Act, this complaint shall be served upon the respondent. The respondent shall file an answer with the Hearing Clerk, United States Department of Agriculture, Washington, D.C. 20250-9200, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. § 1.130 et seq.). Failure to file an answer shall constitute an admission of all the material allegations of this complaint.

The Animal and Plant Health Inspection Service requests:

1. That unless the respondent fails to file an answer within the time allowed therefor, or files an answer admitting all the material allegations of this complaint, this proceeding be set for oral hearing in conformity with the Rules of Practice governing proceedings under the Act; and
2. That such order or orders be issued as are authorized by the Act and warranted under the circumstances including an order:

(a) Assessing civil penalties against the respondent in accordance with section 6(b) of the Act (15 U.S.C. § 1825(b)); and

(b) Disqualifying the respondent for a specified period as provided in section 6(c) of the Act (15 U.S.C. § 1825(c)) from (i) showing, exhibiting or entering any horse, or otherwise participating in any horse show or exhibition; and (ii) judging or managing any horse show, horse exhibition, horse sale or auction. "Participating" means engaging in any activity beyond that of a spectator, and includes, without limitation, transporting or arranging for the transportation of horses to or from equine events, personally giving instructions to exhibitors, being present in the warm-up or inspection areas, or in any area where spectators are not allowed, and financing the participation of others in equine events.

Done at Washington, D.C.

this 8th day of October, 2014



Administrator
Animal and Plant Health Inspection Service

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